

The Honorable Robert J. Bryan

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT TACOMA**

UGOCHUKWU GOODLUCK
NWAUZOR, FERNANDO AGUIRRE-
URBINA, individually and on behalf of
all those similarly situated,

Plaintiffs/Counter-Defendants,

v.

THE GEO GROUP, INC.,

Defendant/Counter-Claimant.

Case No. 3:17-cv-05769-RJB

**MOTION OF IMMIGRATION
REFORM LAW INSTITUTE FOR
LEAVE TO FILE BRIEF AS
AMICUS CURIAE IN SUPPORT OF
DEFENDANT'S MOTION FOR
SUMMARY JUDGMENT AND IN
OPPOSITION TO PLAINTIFFS'
MOTION FOR SUMMARY
JUDGMENT**

NOTE ON MOTION CALENDAR:
January 24, 2020

Without Oral Argument

MOT. OF IMM. REF. LAW INST.
FOR LEAVE TO FILE BRIEF
AS AMICUS CURIAE
IN SUPPORT OF DEFENDANT
CASE NO. 3:17-CV-05769-RJB

IMMIGRATION REFORM LAW INSTITUTE
25 MASSACHUSETTS AVENUE NW
SUITE 335
WASHINGTON, DC 20001
TEL. (202) 232-5590

1 The Immigration Reform Law Institute (“IRLI”) respectfully asks this Court
 2
 3 for leave to file an *amicus curiae* brief in support of defendants. IRLI’s brief is
 4
 5 appended to this motion.

6 IRLI is a non-profit 501(c)(3) public interest law firm dedicated to litigating
 7
 8 immigration-related cases on behalf of, and in the interests of, United States
 9
 10 citizens and lawful permanent residents, and also to assisting courts in
 11
 12 understanding and accurately applying federal immigration law. IRLI has litigated
 13
 14 or filed *amicus curiae* briefs in a wide variety of cases, including *Wash. All. of*
 15
 16 *Tech. Workers v. U.S. Dep’t of Homeland Sec.*, 74 F. Supp. 3d 247 (D.D.C. 2014);
 17
 18 *Save Jobs USA v. U.S. Dep’t of Homeland Sec.*, No. 16-5287 (D.C. Cir. filed Sept.
 19
 20 28, 2016); *Matter of Silva-Trevino*, 26 I. & N. Dec. 826 (B.I.A. 2016); *Matter of C-*
 21
 22 *T-L-*, 25 I. & N. Dec. 341 (B.I.A. 2010); and *In re Q- T- -- M- T-*, 21 I. & N. Dec.
 23
 24 639 (B.I.A. 1996).

25 IRLI has contacted counsel for both parties. Defendant does not oppose this
 26
 27 motion for leave to file an *amicus curiae* brief. Plaintiffs oppose.

28 “An amicus brief should normally be allowed when . . . the amicus has
 unique information or perspective that can help the court beyond the help that the

lawyers for the parties are able to provide.” *Cnty. Ass’n for Restoration of the Env’t v. Deruyter Bros. Dairy*, 54 F. Supp. 2d 974, 975 (E.D. Wash. 1999). Here, IRLI presents unique perspective beyond the help that the lawyers for the parties have provided. Specifically, IRLI presents an analysis of preemption doctrine that was not addressed in either party’s motion for summary judgment, and also offers additional support for defendant’s derivative sovereign immunity.

CONCLUSION

For the foregoing reasons, the instant motion should be granted.

Dated: January 15, 2020

Respectfully submitted,

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Attorneys for *Amicus Curiae*
Immigration Reform Law Institute

CERTIFICATE OF SERVICE

I hereby certify on this 15th day of January, 2020, I electronically filed and served the foregoing via the Court's CM/ECF system.

/s/ Richard M. Stephens

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